

From: [Cath Ranson](#)
To: [NDE](#)
Subject: NDF Draft for Consultation
Date: 15 November 2019 08:43:59
Attachments: [image001.png](#)
[image002.png](#)
[2019 11 WG NDF Ceredigion CC Consultation response.doc](#)

Please find attached the response to the NDF consultation prepared on behalf of Ceredigion County Council and agreed by its Consultation Panel.

Regards

Cath Ranson



Cath Ranson
Rheolwr Polisi Cynllunio /
Planning Policy Manager,
Economi ac Adfywio
Economy and Regeneration
Neuadd Cyngor y Sir, Stryd y Farchnad, Aberaeron,
Ceredigion SA46 0AT

www.ceredigion.gov.uk



--

Rydym yn croesawu gohebiaeth yn Gymraeg a Saesneg. Cewch ateb Cymraeg i bob gohebiaeth Gymraeg ac ateb Saesneg i bob gohebiaeth Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

Ymwadiad:

Er y cymerir pob gofal posib i sicrhau cywirdeb unrhyw wybodaeth a chynghor a roddir yn yr ohebiaeth hon, ni dderbynnir atebolrwydd am unrhyw golledion a all godi o unrhyw gamgymeriadau sy'n gynwysedig ac fe'ch atgoffir o'r angen i chi ofyn am gynghor proffesiynol eich hun.

Bwriedir y neges ebost hon, ac unrhyw atodiadau iddi, at sylw'r person(au) y'i danfonwyd atynt yn unig. Os nad chi yw'r derbynnydd y cyfeiriwyd y neges hon ato ef neu hi, neu'r person sydd gyfrifol am drosglwyddo'r neges hon iddo ef neu hi, mi ddylech hysbysu'r anfonwr ar eich union. Oni bai mai chi yw'r person neu gynrychiolydd y person y cyfeiriwyd y neges hon at ef neu hi nid ydych wedi eich awdurdodi i, ac ni ddylech chi, ddarllen, copio, dosbarthu, defnyddio na chadw'r neges hon nac unrhyw gyfran ohoni.

O dan y Ddeddf Amddiffyn Data 1998 a Deddf Rhyddid Gwybodaeth 2000 gellir datgelu cynnwys y neges ebost hon.

We welcome correspondence in Welsh and English. Correspondence received in Welsh will be answered in Welsh and correspondence in English will be answered in English. Corresponding in Welsh will not involve any delay.

Disclaimer:

While reasonable care is taken to ensure the correctness of any information and advice given in this correspondence no liability is accepted for losses arising from any errors contained in it and you are reminded of the need to obtain your own professional advice.

The information in this email and any attachments is intended solely for the attention and use of the named addressee(s). If you are not the intended recipient, or person responsible for delivering this information to the intended recipient, please notify the sender immediately. Unless you are the intended recipient or his/her representative you are not authorised to, and must not, read, copy, distribute, use or retain this message or any part of it.

Under the Data Protection Act 1998 and the Freedom of Information Act 2000 the contents of this email may be disclosed.

Consultation Response Form

Your name	Cath Ranson
Your address	Neuadd Cyngor y Sir, Stryd y Farchnad,Aberaeron, Ceredigion SA46 0AT
Preferred contact details (email/phone/post)	email to [REDACTED] ldp@ceredigion.gov.uk [REDACTED]
<u>Organisation (if applicable)</u>	<u>Ceredigion County Council</u>

To note that the response is complementary to the regional response submitted by the Growing Mid Wales Partnership.

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

The document reads as if it seeks to provide everything to everyone. Some of the outcomes are aspirational, fail to deliver spatial understanding and leadership, not supported by evidence and lacking in acknowledgement of the tensions between outcomes.

For example

Outcome 2 states

'In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification.'

There needs to be improved recognition of what actually happens in rural areas and what economies could be supported to ensure thriving rural areas – not just agriculture and agricultural supply chains.

The NDF fails to explain how it will achieve thriving rural economies and rural communities this outcome in the face of Outcome 5.

The NDF is considered to be silent on the effects of growing the cities at the expense of rural areas and in so doing further skewing the population profiles of rural areas. The NDF would have benefitted from significantly more spatial analysis / spatial modelling of who gains and who loses, particularly in the poorer parts of Wales.

It should be noted that such spatial analysis should have informed policy development and would be difficult to retrofit to support policy directions already identified.

Outcome 5

‘Cities and large towns are magnets for jobs and investment, while people are drawn to live and work there for the economic and social opportunities they provide.

Development plans will enable and support aspirations for large towns and cities to grow, founded on sustainability and urban design principles, active travel and investment in key built and green infrastructure to enable population and economic growth whilst reducing pollution. Areas outside the urban centres will benefit directly from the strength of our large towns and cities, through improved connectivity and additional investment in new homes, jobs and services.’

The NDF fails to acknowledge the tensions between economic growth, biodiversity and climate change and to recognise that not all areas outside urban centres are hinterland to these urban centres.

Given its scale and the prevalence of national institutions in Aberystwyth this should be recognised as the regional centre for the fourth region of Mid Wales, as it was in the Wales Spatial Plan.

The NDF needs to take into account the emerging GMW agenda, to be stronger on rurality and to recognise the importance of the rural job infrastructure underpinning the rural economy.

The NDF would benefit from focusing more on the benefits of growing the economy through digitisation and, in so doing, reducing the need for commuter travel.

Currently the NDF Map has no coherence, with an imbalance in the regional characteristics and with a large empty space where rural mid Wales’ characteristics and movement patterns should be identified.

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

The spatial strategy is silent in significant parts of Mid and West Wales. As currently written the reliance on three regions, with each region having an area of strategic growth, driving its economy and to be planned for in a SDP, fails Mid Wales.

The NDF must recognise Mid Wales as a discrete region, drawing on the development of four growth deals across Wales.

The failure to recognise Mid Wales as a separate region, with no commonality of interest with the conurbation of South west and south east Wales provides a flawed starting point for the Plan.

To some extent Policy 4 abdicates Welsh Government responsibility at a national level for rural areas. This absence of understanding of NDF applicability to Mid Wales is expressed clearly in the key diagrams for Wales: at National and at Mid and South West Wales diagrams – lacking in interpretation of what the NDF means for Mid Wales, the relationship between Mid Wales and the marine environment and lacking in any form of responsibility for the rapidly denuded public transport network in Mid Wales.

Whilst Ceredigion Council is fully in agreement with the principle of the future of rural Wales being best planned for at the regional and local level, this must be to an appropriate regional boundary (i.e. to four regions) and with national policy support to underpin locally driven appropriate economic development to better address the current socio-economic deficits.

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

Broadly agree, but noting that this is not just about achieving greater growth through release of public sector redundant land holdings.

Most authorities will have a corporate Asset Management Plan for effective use of land and buildings to achieve the greatest economic, community, social and cultural good for the Authority: Individual authorities will put forward candidate sites for consideration in LDP preparation – some identified for economic use, regeneration and with suitable housing sites and others for business, environment or community uses, sometimes a mixed use development.

In identifying potential allocations for LDPs, local planning authorities are tasked with a tremendous balancing act in identifying sustainable locations, with a willing developer, locations that are viable and able to absorb the increasing costs, for example of meeting design standards, providing sprinkler systems, SuDS and enhancing biodiversity. To achieve this it is sometimes the case that the most sustainable locations do not make the cut on viability. In rural areas for small developments (generally by small independent builders) it may be that to achieve the most sustainable location would necessitate subsidy in order to achieve viability: Welsh Government may wish to consider this as part of the mix to increase the delivery of housing in Wales, whilst ensuring commitment to affordability in the occupancy.

Viability is crucial for people living rural livelihoods and seeking to live in local communities in close proximity to work and family connections.

Currently Housing is not cheap and not affordable, with small local building companies unable to achieve the economies of scale that larger companies and volume builders can achieve.

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

It is worth noting that the telecoms industry should be seeking to build on innovative work to incorporate equipment into the landscape and the townscape. Following the recent announcement of investment in sharing antennae it is important to recognise the need for equivalence in installation in rural and urban areas, noting the potential for reduced reliance on physical commuting. 5G is to be welcomed, but it is important to note that the technology for roll out in rural areas will be very different to urban 5G.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

Broad agreement, noting the need for innovative solutions for retrofitting charging infrastructure into existing town centres and communities.

There seems to be a lack of clarity that 'ULEV' embraces much more than electric and hybrid vehicles, ULEVs are currently defined as having less than 75 grams of CO₂ per kilometre (g/km) from the tail pipe. The NDF needs improved clarity on when it is referring to electric and hybrid vehicles and when to the wider definition of ULEVs.

6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Broadly in agreement, but noting the inconsistency of NDF 'to ensure they are not unduly compromised by future development' with the interpretation in PPW 10 of section 6 Duty 'This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity.'

In providing clarification as to the statutory section 6 duty it is to be assumed that in this instance PPW takes precedence and the NDF wording should be modified to align with PPW10. However, this inconsistency needs to be resolved, either by alignment of wording or advice on which document will take precedence.

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Broad agreement with these policies, but CCC notes that all forms of renewables, including hydro power, should be referred to and that the interrelationship between the NDF and WNMP should be referenced, recognising the need for off-shore renewables and renewables associated with sea defences to be a part of the mix.

There is also a need to recognise the emergence of technologies during the lifetime of the NDF to better address renewable energy. During the life of the Framework emerging technologies will support resolution of seemingly intractable current problems.

It is to be regretted that the NDF has missed an opportunity to recognise that paucity of transmission routes inhibits growth of the renewables industry and that WG needs to support the improvement of transmission routes/ increased capacity and to support the development of new technologies around hydrogen and battery storage

There will be occasions where the need for high energy users to co-locate with raw materials of renewables requires a flexible approach to the urban / rural divide

The recent delay by Business Secretary Andrea Leadsom in a decision on the Development Consent Order (DCO) for Wylfa Newydd raises stark questions about the commitment to development of new renewables technologies to respond to the enhanced timeline occasioned by WG's declaration of a climate change emergency.

--

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

The NDF must recognise that there are four regions

9. North Wales (policies 17-22)

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

- To what extent do you agree or disagree with the proposed policies and approach for the North Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

10. Mid and South West Wales (policies 23-26)

Swansea Bay and Llanelli is the main urban area within the region and is our preferred location for growth. We also identify a number of rural and market towns, and the four Haven Towns in Pembrokeshire, as being regionally important. The haven Waterway is nationally important and its development is supported. We support proposals for a Swansea Bay Metro.

- To what extent do you agree or disagree with the proposed policies and approach for the Mid and South West Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

Mid and South West Wales

There is little commonality of interest between the Mid Wales region and the south west Wales region and Mid Wales should be given separate status as an independent region in order to shape an alternative model of rural sustainability founded on its quality environment, strong potential for technological innovation through collaborations between the public sector and

the Universities, strong potential to improve on health and wellbeing and improved understanding of culture and environment through tourism The growing Mid Wales partnership must not be part of a larger region which has urban development as its core.

Of the regional policies for Mid and south west Wales (only 4), only part of one policy applies to Mid Wales and this seeks to identify 3 sub regional towns as foci for development. Ceredigion CC considers this 'half policy' to be fundamentally flawed in that the distances between these towns is too great to support the area and that more emphasis should be placed on the network of market towns.

The Council also notes that Aberystwyth should be recognised for its role as a regional centre for a mid Wales Region.

12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

Sustainability is reliant on support for locally cohesive, rural Welsh language communities, essential to support Welsh Government's ambition for growing the language.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

Ceredigion CC welcomes the definite emphasis on more than the by now conventional conservation of "special" habitats or species; this attitude looks as if it is being replaced strongly in Objective 6 Natural Resources, Circular Economy & Flooding by a broader view of the environment and what it provides and (at last) that it is essential to life.

However, the HRA screening is only about Natura 2000 and Ramsar sites (albeit our best examples of habitat or species). Only two of the draft NDF Objectives have been screened out (Welsh Language and Cohesive Communities) (considered aspirational) and only 5 sub-objectives from the remaining 10 Objectives. Everything else about the draft NDF has the potential to significantly impact our Natura 2000 and Ramsar sites. This suggests to me that the potential for impacts on other environmental aspects is at least as great, probably greater.

This HRA screening process doesn't "screen" for impacts on the wider environment. Potential impacts will still need to be considered, avoided, mitigated, compensated for and enhancements identified and provided at the appropriate stages of policy, plan and project development. All policies, plans and projects which arise from or

develop from this draft NDF will have to contribute to Objective 6 (and also Wellbeing of future Generations Act 2015 Objective 2 – A Resilient Wales (where resilience refers to Ecosystem Resilience)).

However, dividing Wales into 3 regions where Mid and West Wales is one region is not a good start. This includes that none of the boundaries make sense ecologically, by water catchment or by NRW Area Statement Areas.

The NDF seems to be following NRW's lead in separating the Marine Area Statement area from the adjacent land areas. When the NDF identifies, for example, the "Havens" as areas to concentrate on, this is not an example of joined up thinking.

With the publication of the Welsh National Marine Plan and noting the overlap of terrestrial and marine jurisdictions within the intertidal zone, integrated coastal zone management will be crucial, recognising both interdependencies and impacts of one with the other.

The Council would welcome support for a focus on some of the innovative aspects of Objective 6.

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

As written there is an inconsistency between the regions in that North Wales is identified on the Map as having 200,000 Welsh speakers, there is no comparable identification of numbers or proportions in the other regions. It would be helpful to include a map of Wales showing the proportions of Welsh speakers.

In planning it is important to develop a resilient approach to identifying potential impacts (positive and negative) of planning decisions on the Welsh language against some spatially identified sensitivities. Whilst this is most appropriate at the local level, there needs to be a consistency in approach across Wales. Mitigations and enhancement of positive effects could be improved by use of section 106 agreements and, potentially, by WG funding to support initiatives.

Ceredigion County Council is committed to delivering a work place environment that supports working through the medium of Welsh, supports staff to learn to speak and use Welsh in the Workplace, supports the use of Welsh language place names and supports Welsh in Education, encouraging parents to learn Welsh and in the provision of social care.

The Council is committed to supporting business and community enterprise through the medium of Welsh and to growing the strength of the circular economy through community enterprises such as the award winning Clettwr Community shop, café and events centre.

In a capacity wider than the NDF it will be important for WG to work with the Media in Wales to increase opportunities for listening, watching and reading Welsh, with universities in Wales to ensure the continuing (and potentially improving) opportunities for students to study and live through the medium of Welsh to ensure the achievement of its targets for growth of the Welsh language

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

CCC considers that more effort should have been placed on spatial analysis to establish a mechanism that would be resilient across Wales and for large and small scale communities to identify areas with significant potential for language growth and areas of significant sensitivity, based on a combination of numbers and of percentages

Improved support / safeguarding for farming would encourage safeguarding of the language.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

A number of policies within the NDF are reliant on changes to be made to PPW 10 and associated Planning Guidance on publication of the NDF. Where this interdependency exists there should have been absolute clarity in the relationship and the necessary changes to other Planning Policy and Guidance should have been identified and included within this consultation and within the SA to establish the acceptability of these changes in policy.

For example CCC has strong concerns at the likely removal of Strategic Search Areas, with particular focus on the identified area within Ceredigion. The Authority continues to work with interested parties in bringing forward proposals for wind farms to identify cost effective means of energy transmission or to attract local energy users. It is difficult to comment on policy changes that are inevitable consequences of the NDF but which haven't been identified specifically within the consultation.

The Council notes the potential for renewed interest in Wales' rare / precious metals alongside increasing global demand and overreliance on a small number of locations world wide.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
--	--------------------------